

Exhibit A

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:		: Bankruptcy No. 20-20772-GLT
John D. Stahl		: Chapter 13
	Debtor	:
		: Doc #
Carvana, LLC		:
	Movant	: Related to Doc #15
vs.		:
		:
John D. Stahl		: Hearing date/time: 6/22/2020 @ 10:00 am
	Debtor/Respondent	:
		:
and		:
		:
Ronda J. Winnecour, Esquire		:
	Trustee/Respondent	:

**OBJECTION TO CONFIRMATION OF THE PLAN DATED 03/16/2020**

Carvana, LLC ("Movant"), by its attorneys, Hladik, Onorato & Federman, LLP, objects to confirmation of the Chapter 13 Plan of Debtor, John D. Stahl ("Debtor"), as follows:

1. As of the bankruptcy filing date of February 29, 2020, Movant holds a secured Claim against the Debtor's Vehicle, a 2016 Jeep Patriot 4WD, VIN # 1C4NJRFB1GD626434 (the "Vehicle").
2. Movant is in the process of filing a Proof of Claim by the 12/21/2018 bar date with a total debt secured claim in the amount of \$15,107.47, with an interest rate of 20.80%.
3. The Plan proposes to pay a total claim of \$22,080.00, with an interest rate of only 5.00%.
4. The Plan violates of 11 USC § 1325(a)(5)(B)(ii) by not providing for Movant to receive the full value of the secured portion of its claim. While the debt was incurred more than 910 days prior to the filing of this bankruptcy case, Movant is entitled to the full value of the secured portion of the claim at the contract interest rate.
5. While the current Plan lists the claim amount in excess of the Proof of Claim Movant is in the process of filing, Trustee will not disburse any amounts greater than the filed Claim.

6. Any attempt by the Debtor to modify this Contract with Movant should be denied.

7. Movant objects to the feasibility of the Plan under 11 U.S.C. § 1325(a)(6). The Plan proposed by Debtor is not feasible. Movant requests that the bankruptcy case either be converted to a Chapter 7 or be dismissed pursuant to 11 U.S.C. § 1307.

WHEREFORE, Movant respectfully requests that this Honorable Court deny confirmation of the Debtor's Chapter 13 Plan.

Respectfully submitted,

Dated: 04/22/2020

/s / Bradley J. Osborne, Esquire  
Bradley J. Osborne, Esquire  
Hladik, Onorato & Federman, LLP  
Attorney I.D. # 312169  
298 Wissahickon Avenue  
North Wales, PA 19454  
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Email: bosborne@hoflawgroup.com

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Ronda J. Winnecour, Esquire		: :
	Trustee/Respondent	: :

**CERTIFICATE OF MAILING OF OBJECTION TO THE PROPOSED  
PLAN TO PARTIES IN INTEREST**

I, Bradley J. Osborne, Esquire, attorney for Carvana, LLC ("Movant"), certify that  
I served a copy of the attached Objection to the Plan to the parties below on 04/22/2020:

Russell A. Burdelski, Esquire  
Via ECF:  
atyrusb@choiceonemail.com  
*Attorney for Debtor*

John D. Stahl  
1 Santiago Street  
Pittsburgh, PA 15214  
Via First Class Mail  
*Debtor*

Ronda J. Winnecour, Esquire  
Via ECF:  
cmecf@chapter13trusteewdpa.com  
*Trustee*

Date: 04/22/2020

Respectfully Submitted,  
/s / Bradley J. Osborne, Esquire  
Bradley J. Osborne, Esquire  
Hladik, Onorato & Federman, LLP  
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**ORDER**

Upon consideration of Carvana, LLC's Objection to Confirmation of the proposed Plan, and having heard the argument of counsel and for good cause having been shown;

It is on this \_\_\_\_\_ day of \_\_\_\_\_, 2020 ORDERED that the Confirmation is DENIED.

BY THE COURT:

\_\_\_\_\_  
Honorable Gregory L. Taddonio  
U.S. Bankruptcy Judge